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Attorneys for United States of America

UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA

IN THE MATTER OF THE TAX )  
LIABILITIES OF: )  
JOHN DOES, United States persons who, )  
at any time during the period January 1, 2013, )  
through December 31, 2015, conducted )  
transactions in a convertible virtual currency )  
as defined in IRS Notice 2014-21. )

Civil Number:

**NOTICE OF FILING *EX PARTE***  
**PETITION FOR LEAVE TO SERVE**  
**“JOHN DOE” SUMMONS**

The United States of America notifies the Court that it has commenced this *ex parte* proceeding pursuant to Section 7609(f) of the Internal Revenue Code (26 U.S.C.), for leave to serve an Internal Revenue Service “John Doe” summons upon Coinbase, Inc. Pursuant to 26 U.S.C. § 7609(h)(2), the

1 determination to be made by the Court “shall be made *ex parte* and shall be made solely on the petition  
2 and supporting affidavits.” Thus, the pleadings filed in this proceeding will not be served upon any  
3 person or entity and no other filings are permitted from other persons or entities. Accordingly, this  
4 matter is ripe for the Court’s consideration.

5 The United States requests that the Court review the Petition and supporting documents and enter  
6 the Proposed Order at the Court’s earliest opportunity.

7 Dated this 17th day of November, 2016.

8 CAROLINE D. CIRAULO  
9 Principal Deputy Assistant Attorney General

10 /s/ Jeremy N. Hendon  
11 /s/ Amy Matchison  
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